

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in compliance with D.N.J. LBR 9004-1

FOX ROTHSCHILD LLP

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In re:

AMERICAN LIMOUSINE LLC

Debtor.

Case No. 21-10121-SLM

Chapter 11 (Subchapter V)

Hon. Stacey L. Meisel

Hearing Date: May 11, 2021

Hearing Time: 11:00 a.m.

Objection Deadline: May 4, 2021

**NOTICE OF MOTION OF MAHWAH PROPERTY OWNER, LLC TO ALLOW AND
COMPEL PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM UNDER
11 U.S.C. § 503(b)(1) FOR POST-PETITION AMOUNTS DUE FOR
POSSESSION OF REAL PROPERTY**

PLEASE TAKE NOTICE that on May 4, 2021, or as soon thereafter as counsel may be heard, Mahwah Property Owner, LLC (“Mahwah”), an administrative creditor in the above-captioned subchapter V chapter 11 case of American Limousine LLC (the “Debtor”), by and through its counsel, Fox Rothschild LLP, shall move before the Honorable Stacey L. Meisel, United States Bankruptcy Judge, at the United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey 07102, for the entry of an order pursuant to 11 U.S.C. § 503(b)(1) allowing and compelling payment of an administrative expense to Mahwah for unpaid amounts incurred by the

Debtor for use and possession of commercial property since the petition date, for such further relief that the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that in support of its motion, Mahwah shall rely upon the certification and memorandum of law submitted herewith pursuant to D.N.J. LBR 9013-1(a).

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-2, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, 50 Walnut Street, Newark, New Jersey 07120, and served upon Mahwah's undersigned counsel at 49 Market Street, Morristown, New Jersey 07960, no later than seven (7) days prior to the return date.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, this motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-3 and the relief sought herein may be granted without a hearing.

FOX ROTHSCHILD LLP

Attorneys for Mahwah Property Owner, LLC

By: /s/ Michael R. Herz
Michael R. Herz, Esq.
Joseph A. Caneco, Esq.

Dated: April 20, 2021